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**Pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**DECLARATION OF MATTHEW R.
COWAN IN SUPPORT OF PARTIES'
STIPULATION EXTENDING
DEFENDANTS' TIME TO RESPOND
TO PLAINTIFFS' COMPLAINT**

Judge: Hon. Mark C. Scarsi
Courtroom: 7C

1 I, Matthew R. Cowan, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the
3 State of California. I am a partner with the law firm O'Melveny & Myers, LLP,
4 counsel of record for Defendants in the above-captioned action. I make this
5 Declaration in support of Plaintiffs Yitzchok Frankel; Joshua Ghayoum; and Eden
6 Shemuelian's ("Plaintiffs") and Defendants The Regents of the University of
7 California; Michael V. Drake; Gene D. Block; Darnell Hunt; Michael Beck;
8 Monroe Gorden, Jr.; and Rick Braziel's ("Defendants") (collectively, the "Parties")
9 Stipulation Extending Defendants' Time to Respond to Plaintiffs' Complaint. I
10 have personal knowledge of the matters stated herein and, if called upon, I could
11 and would competently testify hereto.

12 2. Plaintiffs filed the Complaint in this action on June 5, 2024.

13 3. Defendants retained O'Melveny & Myers, LLP as counsel in this
14 action on June 17, 2024.

15 4. Under Federal Rule of Civil Procedure 12(a), Defendants' current time
16 to respond to the Complaint is July 5, 2024.

17 5. After conferring on the issue, the Parties agree to extend Defendants'
18 time to respond to Plaintiffs' Complaint by 45 days, from July 5, 2024 to August
19 19, 2024.

20 6. The Parties agree that good cause exists for the agreed-upon extension
21 because Defendants retained O'Melveny & Myers, LLP as counsel on June 17,
22 2024 and need time to investigate the Complaint and finalize a response to it.

23 7. The Parties further agree that good cause also exists for the agreed-
24 upon extension because Plaintiffs' Motion for a Preliminary Injunction (ECF No.
25 48) is still outstanding.

26 8. This is the Parties' first request for an extension of time for Defendants
27 to respond to Plaintiffs' Complaint. This is the second request for a continuance or
28 an extension of time in this action. The first was a Stipulation to Continue the

1 Hearing on Plaintiffs' Motion for a Preliminary Injunction (ECF No. 51). As of the
2 filing of these papers, the Court has not yet ruled on this request.

3 I declare under penalty of perjury under the laws of the United States that the
4 foregoing is true and correct. Executed this 27th day of June, 2024, at Los Angeles,
5 California.

6 /s/ Matthew R. Cowan

7 Matthew R. Cowan
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